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3 LAW OFFICES OF RICHARD McKNIGHT, P.C.
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Attorney for Debtor

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

Re:

Case No.: BK-S-09-23414-BAM

RAINBOW 215, LLC,

Debtor.

Chapter 11

Chapter: 11

Hearing Date: March 2, 2010

Hearing Time: 10:00 a.m.

APPLICATION FOR ALLOWANCE OF ATTORNEYS' FEES AND COSTS

The Application of the debtor, Rainbow 215, LLC, respectfully represents that:

1. The LAW OFFICE OF RICHARD MCKNIGHT, P.C. are the attorneys of record for the debtor in the above proceedings. The debtor makes this Application for Allowance of reasonable attorneys' fees for professional services actually rendered to the debtor herein, and for reimbursement of proper costs and expenses incurred by it in the performance of said services;

2. All services for which compensation is requested were performed in connection with the bankruptcy herein. All services were performed after the filing of the Petition for Relief under Chapter 11 and were in connection with the duties prescribed to the debtor by the Order of the Bankruptcy Court;

3. The Order Approving Employment of Counsel was entered on November 6, 2009.

4. Work performed by the LAW OFFICE OF RICHARD MCKNIGHT, P.C. for the applicable period ranging from June 16, 2009 through December 31, 2009 is as follows:

1 Flat fee work in excess of 20 hours for pre-petition consultation, preparation of
2 bankruptcy schedules, preparation of petition and schedules, attendance at Initial Debtor
3 Interview, attendance at 341 meeting.

4 Hourly work in excess of 25 hours for preparation of initial motions to approve cash
5 collateral order with City National Bank, motions to approve employment of debtor's counsel
6 and property manager, motions to approve leases with IHOP, ACL Tan, and Cloud 9, review
7 and response to objections, attendance at hearings to approve, drafting of orders granting the
8 same..

9 Hourly work in excess of 30 hours preparation of initial disclosure statement and
10 proposed plan of reorganization, review and response to objections, attendance at hearings to
11 approve disclosure statement.

12 Hourly work in excess of 25 hours for miscellaneous tasks including contacting and
13 securing expert witnesses, ongoing consultation with client, negotiations with City National
14 Bank and other creditors, filing and pursuit of other motions.

15 5. Attached hereto is Exhibit "A" which details a portion of the LAW OFFICE OF
16 RICHARD MCKNIGHT, P.C. 's activities in this matter, as well as charges therefor;

17 6. The LAW OFFICE OF RICHARD MCKNIGHT, P.C. has incurred unpaid fees and costs
18 in the amount of \$21,270.83 (fees: \$20,117.50, costs: \$1,153.33) from June 16, 2009 through
19 December 31, 2009;

20 || 7. No prior fee applications have been filed.

8. The hourly rates and the persons working during this time period are as follows:

22	<u>ATTORNEY NAME</u>	<u>HOURLY RATE</u>	<u>HOURS OF THIS APPLICATION</u>	<u>Fee</u>
23	David Mincin, Esq.	\$250.00	79.00 Hours ¹	\$19,750.00
24	Matthew McAlonis, Esq.	\$175.00	2.10 Hours	\$367.50

¹ This excludes flat fee hours incurred by DM.

<u>ATTORNEY NAME</u>	<u>HOURLY RATE</u>	<u>HOURS OF THIS APPLICATION</u>	<u>Fee</u>
TOTAL FEES:			\$20,117.50

9. No agreement or understanding exists between the LAW OFFICE OF RICHARD
 4 MCKNIGHT, P.C. and any other person for the sharing of compensation to be received for services
 5 rendered in connection with this case or any adversary proceeding.

10. Funds available in the estate to pay the claim for attorneys' fees consist of
 7 approximately \$3,948.50.
 8

9 Debtor prays for an Order allowing the sum of \$21,270.83 as and for reasonable attorneys'
 10 fees and costs incurred by the LAW OFFICE OF RICHARD MCKNIGHT, P.C. as outlined hereinabove.

11 DATED this 28th day of January 2010.

12 LAW OFFICES OF RICHARD MCKNIGHT, P.C.

14 By: /s/ David Mincin
 15 David Mincin, Esq.
 16 Nevada State Bar No. 5427
 17 330 S. Third Street #900
 Las Vegas, Nevada 89101
Attorneys for Debtor